

GLOBAL FORCE)	
ENTERTAINMENT, INC. and)	
JEFFREY JARRETT)	
)	CIVIL ACTION NO. 3:18-cv-00749
Plaintiffs/Counter-Defendants,)	
)	CHIEF JUDGE CRENSHAW
v.)	MAGISTRATE BARBARA D. HOLMES
)	
ANTHEM WRESTLING)	JURY DEMAND
EXHIBITIONS, LLC,)	
)	
Defendant/Counter-Plaintiff.)	

Pursuant to 401-403 and 611(a) of the Federal Rules of Evidence, Plaintiffs Global Force Entertainment, Inc. and Jeffrey Jarrett (“Plaintiffs”) respectfully move to exclude and preclude certain subjective, non-neutral, and inaccurate terms used by Defendant to refer to or describe (1) Global Force Entertainment, Inc.’s original master recordings of the original 16 episodes and (2) the *One Night Only* shows titled GFW Amped Anthology, Parts 1 through 4 distributed by Defendant. Plaintiffs also seeks clear and consistent terms to aid the jury and avoid confusion at trial.

(1) references to Global Force Entertainment, Inc.’s original master recordings of the original 16 episodes as “raw,” “raw footage,” “unedited,” or “unfinished”;

(2) references to the *One Night Only* shows titled GFW Amped Anthology, Parts 1 through 4 as “broadcast ready” or “fully edited.”

The comparative terms are not relevant, are more prejudicial than probative, and are not truthfully provable due to Defendant's admitted deletion of the only copy of Global Force Entertainment, Inc.'s original master recordings of the original 16 episodes.

Plaintiffs have filed simultaneously herewith their memorandum in support of this motion. Counsel for Plaintiffs has conferred counsel for Defendant on June 4, 2020. Defendant opposes this motion.

Wherefore, Plaintiffs respectfully request the Court Order:

(1) All references to Global Force Entertainment's master recordings as "raw," "raw footage," "unedited," or "unfinished" is excluded and precluded;

(2) All references to the *One Night Only* shows titled GFW Amped Anthology, Parts 1 through 4 as "broadcast ready" or "fully edited" are excluded and precluded;

(3) All references to Global Force Entertainment, Inc.'s original master recordings of the original 16 episodes be referred to by that description and/or by the phrases "Original Master Recordings" or "Global's Masters;" and

(4) All references to Defendant's *One Night Only* shows titled GFW Amped Anthology, Parts 1 through 4 be referred to by that description and/or by the phrase "Amped Anthology."

Dated: June 5, 2020

Respectfully submitted,

/s/ Samuel F. Miller

Samuel F. Miller, TN Bar No. 22936
Sara R. Ellis, TN Bar No. 30760
Hayley H. Baker, TN Bar No. 037439
MILLER LEGAL PARTNERS PLLC
Fifth Third Center-Suite 2000
424 Church Street
Nashville, Tennessee 37129
Tel/Fax: (615) 988-9590
Email: smiller@millerlegalpartners.com
sellis@millerlegalpartners.com
hbaker@millerlegalpartners.com

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of June 2020, the foregoing document was filed and served via ECF:

Paige W. Mills
Ashleigh D. Karnell
Bass, Berry & Sims PLC
150 Third Avenue South, Suite 2800
Nashville, TN 37201
(615) 742-6200

/s/ Samuel F. Miller
Samuel F. Miller